	Q52 Please comment on your personal experiences over the past 2 calendar years (2019-2020) at EPA with the clearance process (for any scientific products to which you contributed) and/or include any suggestions for improvement. Experiences can include internal clearance and/or cross-agency or inter-agency review.
1	No
2	We don't have a transparent clearance process.
3	NA
4	N/A
5	Timeliness tends to fall by the wayside.
6	The only hurdles I've experienced with clearance for published work had to do with substantive comments that were clearly related to science.
7	Managers (non-technical) take more time to review a document (weeks) and provide very little time (1-2 days) to technical people to work on the document. This result inefficiency due to numerous times of review by layers of reviewers and inclusion of statements that are contradictory or incorrect. Allow scientists to review the document before releasing. Empowerment of employee is good thing, however, the series of meeting (b) (6) could be avoided.
8	No comment
9	No major change from other years; the process always seems to change a little bit due to new systems or organizational modification.
10	Too many reviewers. 1st or 2nd line supervisors should have the authority for final review and clear documents.
11	The amount and quality of the research work that we do is severely negatively impacted by the high amount of work that we do, the high administrative burden, and the shortage of staff and funding.
12	Hire more FTE
13	Submitted an abstract for a scientific meeting but abstract was never reviewed due to managers being too busy so I did not attend or present at the meeting.
14	Too many factors: visibility, priority, laps in appointees.
15	QA department wildly inconsistent and reviews take absurd amounts of time to complete.
16	There were too many bureaucratic layers imposed.
17	Reduce the amount of products needing clearance internal to EPA. The process is burdensome and unnecessary.

18 The [redacted] aspect of clearance in [redacted] is a black hole; you don't know how long it will take or whether you'll get anything meaningful from it. Clearance across [redacted] is inconsistent, and I know they're working on it, but some of the requirements for layers of approval do NOT add any value. (For example, it is overkill to require multiple technical reviews and multiple layers of review for a 250-word abstract to secure a presentation at a conference.) The people who are writing the [redacted] clearance process obviously have not had to get something cleared and have little practical insight for the types and layers of review that are meaningful and ensure integrity.

19 [redacted] Workload is very heavy and very unreasonable.

20 Insufficient data to establish reasonable expectations of the time it will take to clear a scientific product within EPA

21 A secondary review of the primary data gathered by the Agency (or its contractors) should be part of the clearance review process. This review process would ensure that any failed QC would be appropriately documented or any transcription or calculation errors can be corrected before publication.

22 understaffing made it hard to move products through the required check points, management questions seem designed to delay the process

23 The clearance process has been rapid for my scientific products with minor editorial refinements.

24 Always changing, and senior level reviewers make changes to scientific documents based on political leanings.

25 None.

26 The clearance process is well-defined. One thing I would like to note is that survey is way too long.

27 This survey is startting to get a little long.

28 Approval for an application has taken over two years to be released for public use. It is not clear why that process has taken so long and why so many groups of people seem to be involved.

29 The process is different depending upon the purpose; if predominantly scientific it is much easier to clear; if intended for public consumption, it is a much slower process.

30 Presentation documents for external release required approval all the way to the AA, which was new, and added significant lengths of time to the reviewing. It also added in disagreements regarding the science being presented, or how it was presented to be shaded in ways.

31 na

32 no comment

33 [redacted] does not have clearance procedures in place so people usually make sure to include an [redacted] review, an [redacted] review, and review and approval at DD level.

[34] Positive experiences as a member of the (b) (6) team and working on communication products.
[35] Sometimes a (b) (5), (b) (6) was held up from approval without clear understanding why except a political appointee did not like it.
[36] I honestly don't know what the policy is in (b) (6). I've had political and career review of a presentation at a conference but it seemed ad hoc and arbitrary.
[37] quality of internal technical review is sometimes lacking; QA review is not consistent across divisions or centers
[38] (b) (6) was a lying, evil pawn for anti-science politicians and their lobbyists.
[39] I have had no experiences in this area.
[40] NA
[41] The clearance process can be long, which is difficult especially for EPA scientists who are collaborating with external scientific partners. It is not always clear when a product falls into different categories requiring additional review (b) (6)
[42] My supervisor and SES levels were direct and honest with me. The political levels were unclear to me, and it wasn't clear what would catch their attention, or what the hold up was if it did. Luckily I only had one report that did, and I don't think it was a scientific issue that held it up, but I don't really know.
[43] Time required for clearance of technical reports has been very inconsistent. From my understanding, this is largely attributable to staffing shortages.
[44] Very little experience with process.
[45] My manuscript was on hold for two years by (b) (6) and (b) (6). In the end, nothing was controversial in this manuscript and EPA asked for only a few minor changes before publication.
[46] Don't think I have done any work requiring clearances.
[47] The clearance procedure is too arduous and involves too many levels of approval for routine (non-high profile topics) products. It leaves us more vulnerable to scientific integrity issues when so many people "hands" touch these products.
[48] Little to no experience w/ internal clearance process issues

49 Clearance processes for *any* product in the [redacted] is unpredictable and a venue for only senior executives to discuss amongst themselves so that regular staff people cannot notice if wrongdoing is occurring. It puts protecting the largest range of options for senior leadership above protecting *any* work product including scientific ones.

50 Noted above--[redacted]

51 No comment

52 Heavy HQ oversight stalled regional products over the years.

53 The workload impacts the time we have to do good work

54 This is one of the other duties that do not get reflected adequately in performance reviews, CVs, etc. Is it possible to certify clearance reviewers and to count the work effort?

55 The Clearance Process at the national and regional level takes a significant amount of time and attention should be given to reducing the required time period.

56 NA

57 N/A

58 It is largely a bureaucratic process with little value added.

59 n/a

60 Things take forever, not just in the Region but across EPA.

61 If designated high profile, timeline is unclear when something elevated to Center level or above

62 It's unclear to me how the process works. [redacted] seems to have a more formal process than [redacted].

63 N/A

64 [redacted]

65 The clearance process is administratively burdensome and delays work. Note that the "official" clock for clearance starts before documents are entered in any system. As a response to the slow nature of formal sign off, documents are sent ahead of official review so that QA staff and others can do their work before it is formally requested. As a result, the clearance process is much longer than what might be recorded in the system. The clearance process also duplicates journal review which is generally more rigorous. Papers that have (b) (6) and (b) (6) coauthors are routed through 2 clearance systems rather than just the lead office further duplicating work. Externally (academic) led papers get the same level of review as internally-led papers.

66 N/A

67 impossible to predict, mostly because of interference from politicals

68 N/A

69 Clearance processes are not consistent within (b) (6). (b) (6) has additional review requirements for External reports that other centers do not. This is also the case across the agency, Regional review processes are not consistent with (b) (6). With (b) (6) being much more rigorous. Further the continual addition of clearance requirements dramatically increases the time requirements to actually publish and as a result decrease scientific productivity for many PI's. This productivity drain can have negative impacts on PI PARS as well as promotion potential. So there are definitely unintended consequences that need to be considered as well.

70 NA

71 I have no direct experience with clearing products within (b) (6).

72 No different from previous (b) (6) at EPA.

73 While (b) (6) has a scientific clearance process, it is not very transparent. Oftentimes items listed on the clearance form are checked "yes" without any proof, yet managers willing approve and sign off for clearance.

74 The process is inconsistent among offices and inconsistently enforced. In some cases it is overly burdensome and discourages staff from publishing and disseminating results.

75 Current system for (b) (5), (b) (6 and Immediate Office review is ad hoc and prone to errors in routing.

76 I am now at seven months since I submitted my ms. for policy clearance by EPA and still no action. I believe that this delay is a violation of scientific integrity.

77 Once scientific products get above branch chief, or sometimes including branch chief, there can unlimited time to review. There is no deadline for management, so at times, they simply don't bother to review. Not generally because they think it is a bad product or want to interfere, but they would rather review something else, or think something else is more important. Management has no deadline to review products and no one to force them to review a product, so products just sit for years on end at times in management inboxes. Career and political management make their own rules for what they get to and don't bother to review, so somethings can finish quickly, somethings never finish.

78 no

79 N/A

80 N/A

81 To my knowledge, my specific work products are not released or have not been released outside of the Agency.

82 My experience is that managers fail to establish clearance processes, that in my opinion should include basic documentation of methodology, data sources, and results in transparent enough fashion that another analyst could reproduce the results. Managers typically simply accept an analyst's findings, sometimes query them verbally to obtain info on methodology etc but often do not insist on accompanying written documentation. This is the norm and has been for much of the past several years. It used to be a little better back in the (b) (6)

83 Processes for reviewing and approving the release of technical reports developed by a contractor could be better laid out.

84 My previously stated concerns about (b) (6) reopening is not captured in my responses to this section, which were limited to the day-to-day science I rely on to take actions.

85 None, but I no confidence that such a process is transparent and impartial.

86 (b) (6), (b) (5) .

87 N/A

88 program office delays

89 (b) (6) does not use a formal tracking database for product clearance. (b) (6) has had one in place for many years and it may serve as a model for (b) (6) and other offices without formal clearance tracking.

90

The clearance and review process for internal program office publications is not clear.

91 (b) (6) . These are not scientific products as I understand the definition. Our cross agency work makes me aware of products that were at least stalled if not suppressed during the prior administration.

92 The (b) (6) laboratory has an excellent process for reviewing and clearing scientific information.

93 No comments.

94 inter-agency disagreements can hold up scientific products significantly

95 Clearance process is inconsistent and is based on the reviewer.

96 The clearance process was longer (in terms of time and people that needed to review) under the Trump administration. I believe this has changed recently.

97 Managers are not familiar with the process and do not provide accurate information to staff regarding the approval process. Referral to online access of information is not an adequate means of addressing this issue. Training needs to be provided to managers and staff on this process and it needs to be handled consistently across the EPA. Where I was told that I had to have my work reviewed by HQ, the reality was that it was a regional decision. (b) (5) Fortunately the new manager who came on during this time approved the regional work product.

98 The (b) (5), (b) (6) was badly broken. This lead to tremendous confusion and uncertainty around clearance.

99 Difficult to senior staff to sign off on products outside of the agency. Nothing nefarious, it just seems to built into the EPA culture to not want to share with those outside the agency because someone might challenge or find an error. Collaboration with others can often be helpful.

100 The clearance process is confusing, and seems to be ever changing.

101 None

[102] Research products can be routed for additional review or upper level review outside the normal path.

[103] To the extent that scientific processes are used in developing regulations and guidances, both of which I have experience in, I have found internal clearance and review processes effective and sound.

[104] Since peer review journals have 2-3 reviewers, one internal (EPA) review is good enough. Lately, (b) (6) internal review is increased to two from one.

[105] N/A

[106] We currently have no written clearance procedure in (b) (6). The principal clearance official just left the Agency and no one has been announced to replace them. We need a functional process.

[107] n/a

[108] No experience

[109] N/A

[110] N/A

[111] EPA Regions and EPA at large do not seem to have standard procedures for clearance. (b) (6) [redacted] My supervisor did not know the process, neither did our science integrity officer or our regional science liaison. I imagine that the process for releasing a journal article publication is only slightly more understood within the Region.

[112]

The review process for reports or decision letters/justification memos takes far too long. The higher in management the documents go, the feedback moves to grammar, punctuation, etc., and not the decisions that are conveyed within the document.

[113] Communications to media and public should be based on FACTS not political agenda.

[114] clearance process was inconsistent and never ending

[115] Presentations at conferences have a quick clearance.

[116] N/A

[117] No personal experiences.

118

Comment: If the review period was 2018 - 2020 or 2017 - 2020, there would be more instances that could be cited of scientific integrity lapses and potential misconduct. Using this short timeframe guarantees that the results will be antiseptic and non-problematic.

119 None

120 highly burdensome, time consuming, and frustrating. Being forced to accept comments and changes by superiors who are not actively involved in the project is demoralizing, it makes me feel powerless.

121 Rolling the entire clearance process into (b) (6) is very inefficient from a time standpoint. For many products, tech editing, internal technical review, and QA review could go on in parallel rather than in series.

122 I have only cleared 2-3 peer review publications and have little experience by which to base decisions on this.

123 clearance procedure exists in (b) (6)

124 N/A

125 clearance should not take months on scientific products. (b) (6) and (b) (6) clearance guidance is conflicting and should be updated.

126 No Comments

127 Same issues described earlier

128

Communications need to be facilitated (quicker) between offices when dealing with (b) (5) [redacted] with certain documents. Process needs to go more smoothly

129 Very convoluted systems to create and manage products/data. (b) (5), (b) (6) [redacted]

130 Clearance process can take a long time, especially for review from higher officials, and for category A research. It is unclear where the product is at during review process, and also not always clear notification once the product has been cleared.

131 Have not contributed to any published product in the past 2 years. Internal clearances are relatively quick.

132

There are way too many levels of review. It takes an incredibly long period of time to get anything through the internal review process for documents that just stay within EPA. The worker-bees have deadlines that must be met and management has timelines for review, but only worker-bees are admonished for not meeting deadlines.

133

I have little to offer here because I was shut out of reviews I used to contribute to. I don't know how much of that was because I work on (b) (6) and how much was just that our political leadership did not value getting reviews from multiple offices and agencies. I did not contribute to any scientific products because I got the sense that it would make things difficult for my office if (b) (5), (b) (6) .

134 I don't work in the scientific community. (b) (6) .

135 Positive experience with clearance. Process for getting manuscript into Pub Med is arduous and time consuming to the point that you question if you should have submitted a manuscript in the first place. There isn't a mechanism to pay for page charges or submission fees in this agency/region.

136 One would think there would be an (b) (6) wide process for peer review and clearance but this doesn't seem to be the case.

137 I have no comment on this. I have not experienced problems in this area.

138 I only have experience clearing a poster. Process was reasonable.

139 Cross-agency, we should be using the latest science.

140 Clearance process is an administrative burden for research staff. Changing computer systems and incomplete and changing directions about information required add to the admin burden and slow the process of releasing scientific products. Support staff to facilitate clearance would be helpful.

141 Employees need to be aware of any scientific products so they can have the knowledge and understanding

142

(b) (5), (b) (6)

143 All science products had to be reviewed by the [redacted] political leadership, as a result there were some products that were never cleared in the 2 calendar year time frame (2019-2020).

144 Somewhat arbitrary decisions are made to have manuscripts and presentations reviewed by program offices, and this can take weeks to months

145 I have no comments in the items.

146 Clearance procedures are continually changing and complicated by various QA requirements ([redacted]). Scientists are forced to deal with a lot of "administrivia" that impacts our productivity, but I suppose it is all necessary and expected when working for the Government.

147 Clearance of personal technical products and presentation material occurs expeditiously,

148 It is FUBAR with respect to scientific review & only really acts as a recordkeeping (after the fact) procedure.

149 Conflicting advice/requirements between HQ and the Region cannot be resolved because they are completely separate processes and don't talk to each other. This places a tremendous purely administrative burden on staff working on multi-partner projects. The lead Office's/Region' process should be followed. I no longer want to participate. Also the planning horizon for simple presentations using pre-approved documents should not add weeks for internal invitations with short turn-arounds for reviews for supervisors who are not technical experts. We need technical experts to other technical experts materials. Management can and should be aware and sign off if appropriate, but may not have the background to judge the science.

150 Just after it's done, share w/ the agency or at least where one could look if interested (I've never seen this).

151 My personal experiences with the clearance process was revised by adding the [redacted] reviewing the work product prior to the release of the work product.

152 The process is complicated and cumbersome.

153 Time estimate for clearance is rarely followed by many approving officials.

154 As I mentioned before, some projects were killed during clearance, some had to go through several extra months of internal review, and some went right out without a problem. It was not always easy to know which projects would be dragged out.

155 NA

156 As stated before, multiple scientific products -- from technical analyses and reports to mundane communication documents such as newsletters -- were held indefinitely for political reasons and we were not allowed to release them to stakeholders.

157 (b) (5), (b) (6) [redacted]

The point of this process when it was originated was to give Program Office personnel a "heads up" on products that will likely be published/presented soon and to identify any major red flags associated with policy decisions and it was supposed to take, at most, 2 weeks. It has morphed over the years to allowing Program Offices to make substantial commentary on the specific wording within the document, and now seems to have morphed back to more of a heads up approach again. Regardless, this process is in dire need of transparency and consistency.

158 Some delays with program office review of manuscripts as part of (b) (5), (b) (6) [redacted], although this may not be considered internal clearance.

159 Review should begin earlier, with targeted review months prior to completion of the full document. (b) (6) [redacted] management should also do more to support EPA products during IA review and against OMB interference.

160 NONE

161 NC

162 The review and clearance of a routine report took nearly two years when my initial expectation was 3 months.

163 Sowing uncertainty/misinformation into what would otherwise be EPA's clearly stated position that the (b) (6), (b) (5) [redacted] is best available science is a bit concerning. This happened both internally and at OMB inter-agency review and only further compounds work and is inefficient use of the agency's limited resources when it comes to writing rules.

164 Things went into review at (b) (6) [redacted] and came out a year or so later, if at all.

165 Product clearance varies widely by division. The people in the chain of approval steps can vary widely in terms of their attitudes towards clearance. Some always take the maximum amount of time regardless of the deliverable's importance. Some may become frustrated if you submit too many products for clearance. There is favoritism that seems to happen with clearance where some people can get things cleared quickly while others seem to always have to wait a long time. I have heard great things about clearance in other divisions. But (b) (6) frequently has issues that slow things down. In addition to the aforementioned issues, products will sometimes be rejected without notice to the researchers who submitted them. There isn't much transparency on where the item is in the clearance process and what the hold ups are.

166 For products that require (b) (5), (b) (6), there is no timeline established. I had a paper stuck for 1 1/2 years in clearance.

167 When I started, a product was considered "in" for managerial purposes if it was in (b) (6) prior to the deadline. This has shifted to now "cleared" by the deadline, which shifts the goalposts up and now a "September deadline for FY##" really means June, especially if this is a product needing IOAA review or may be controversial. While this just means shifting timelines, the uncertainty in when something needs to be in (b) (6) to be cleared or if it does go through (b) (6) [redacted] when it will get cleared makes things confusing. While my management has agreed upon time-limits for each step within (b) (6), the uncertainty of (b) (6) if needed makes the pressure to move products through higher. I do not feel pressure to cut corners to get products out, but science doesn't move at a known pace and issues like the pandemic can be hugely disruptive, and even delays in contract negotiations can cause issues. Yes, management is amenable to shifting deadlines, but if they cross a (b) (6), then it also becomes harder and there is pressure to replace a different achievable subproduct with the delayed one. This now has increased the workload because a new unplanned subproduct must be created to fill in a gap. The science may be good, but I'd rather spend my time working on the best possible paper/subproduct even if it will be slightly delayed rather than squeezing in something that may just be there to tick a box. EPA has the opportunity to work on projects that aren't bound by short-term grants like colleges, that really drive fundamental scientific needs related to the environment and our associated decision making.

168 N/A

169 No clearance experiences.

170 NA

171

One experience with internal clearance: during the internal review of an annual data analysis publication, (b) (5) [redacted]

172 There could be more standardization with the review time by (b) (6) management to clear products.

173

EPA (b) (6) doesn't have a clearance process that people know about. EPA HQ clearance process in the last two years was subverted by political interference. A report was held up for a year for no apparent reason except that it dealt with climate change related issue apparently. In the one year hold up, no value added or change to the report ensued.

174 NA

175 Clearance should not be a mystery; also, clearance process should include those with sufficient understanding of the work and EPA's Scientific Integrity policy.

176 Clearance process for a report with updated assessment information took almost two years despite the fact that EPA had published using the questioned approaches in the past. Having information on how best to move forward with more streamlined clearance of assessment information when the next cycle of data comes in would be very useful to avoid such lengthy delays in releasing reports and associated data.

177 Inter-agency and intra-agency reviews are "check-the-box" exercises. Rarely any of the internal/external feedback received is addressed, even when multiple offices inside EPA as well as multiple fed. agencies, made same comments.

178 Clearance for some products can take an exceptionally long time. Post-peer review reviews and comments by senior management officials can in some cases help improve the product, but also open opportunities for senior officials, including political appointees, to influence the scientific conclusions.

179 limited

180 My main experience is with clearance of documents to be posted to the public docket. I can't predict how long an internal review of nonurgent materials, sometimes things as simple as meeting notes with outside parties will take. I also can't predict how long CBI review will take.

181 There were long delays and extensive rewrites during reviews in [redacted].

182

The [redacted] clearance of a research product from a colleague has been delayed for quite some time (> year). However, my knowledge of this is somewhat second-hand.

183 No experience with the clearance process.

184 Everything required high level (AA) review, delaying release or making release impossible, missing deadlines.

185 Not very clear what will require advanced notification for clearance.

186 N/A

187

During the last administration, [redacted]

188 Different suboffices in [redacted] have different clearance processes.

189

The clearance process was made exceedingly complicated, with additional layers of review constantly and unpredictably added. An established review process for different types of products should be established. The amount of time for review and the people who should review a particular product need to be outlined to minimize influence by political appointees.

190 There is inconsistency across EPA in the clearance procedures. While [redacted] uses [redacted] and Science Hub, [redacted] does not. So, when an [redacted] scientist is a co-author on a paper led by an EPA scientist external to [redacted], the [redacted] scientist is responsible for completing these entries. This impacts the [redacted] scientist's time and work load. Outside of [redacted], internal reviews don't seem to be expected.

191 None

192 Clear instructions on cross-agency clearance processes would be useful, especially if ALL federal agencies involved had the same procedure.

193 In general, (b) (5), (b) (6) [redacted]. These two specific examples obviously have impacted timelines (and at times) content.

194 improve communication top down including timely feedback that is factual and value added including with specific recommendations for revisions. cross agency - coordination and communication needs to be improved and made a priority with internal checks and balances to automate oversight of execution of cross agency communication/coordination. insulate, as much as possible, and as appropriate, unnecessary influence of politics

195 I have no experience with clearance process.

196 I probably could have answered this section different, but I feel I didn't understand the term "scientific products." Is that only guidance documents (e.g., criteria recommendations) or would that include the development of a letter that makes decisions or recommendations based on science?

197 (b) (5), (b) (6) [redacted]

198 N/A

199 None specific

200 Due to a reorganization that occurred under the Trump Administration, the (b) (6) reviews all EPA documents that will be shared with the public. This results in significant delays with no added value. In fact, (b) (6) is undermining the scientific information that EPA programs present to the public. (b) (6) has told program staff that everything should be written for a 5th-8th grade reading level even when our communities have advanced knowledge and understanding. (b) (5), (b) (6) However, EPA legislation has specific authorities and language for certain programs.

201 clearance time depends on the complexities of the project and responsiveness of collegues

202 changing of clearance protocols, forms, databases ((b) (6) etc) makes initiating the clearance process difficult and time consuming for researchers. Over my tenure, in the past (b) (6) employees (branch secretaries, PA, SEE employees) consistently handled this burden and were more familiar with the process than the scientists.

203 The implementation of (b) (6) clearance policy is inconsistent. In (b) (6), little guidance is provided on how (b) (6) implements the clearance policy. I also have concerns about how QA is viewed within (b) (6) (including (b) (6)). (b) (6) seems to believe that QA only applies to datasets or data/information generated by (b) (6). (b) (5)

204 No direct experience.

205 Usually there is no review or process for cross agency or inter-agency review. There is no process for amount of review time and no requirement for written reply comments. Management often decides to have calls with other agencies or divisions rather than write responses, there are usually no meeting notes.

206

Clearance of web-based models and tools is very unclear. There are standard processes for publications, reports, presentations, etc. (b) (5) [redacted] There are significant differences between organizations and what is required.

207 No experience

208 The (b) (6) system has been a black box; once the document was submitted, it was difficult to track progress.

209 Internal processes allowed for a stringent set of rules that must adhere to the "party line" and the views of headquarters and upper-level management. These processes are different for each division and very ego and viewpoint centric. There are thoughts that this culture will NEVER change in EPA.

210

I have had very poor experiences with (b) (6) managers and scientific integrity. (b) (5), (b) (6) [redacted] (b) (6) decision-makers should not assume what they are given represents scientific consensus. Sometimes, there are scientific vulnerabilities that are not being communicated up. (b) (6) should make a point at hearing dissenting scientific opinions.

211 Most of reviews were impacted by addressing differing scientific opinions decaying significantly the clearance process. Policy shouldn't trump defensible science and differing scientific opinion should be respected and acknowledged.

212 I have research that has been held up for a year. it's a shame the public is not able to access what they are paying for

213 none

214 Training for clearance procedures needs to come from the (b) (6) level. Otherwise it differentiates at the center level. Also there should be an official signed SOP for (b) (6) to follow. That way when there is a deviation the SOP can be referred to have the issue corrected.

215 It is a bit too lengthy

216

The clearance process has become a nightmare! Everything is dumped on the Researcher without help. The amount of up chain communication and information is out of control.

217 NA

218 No basis to judge

219

A scientific product was stalled from moving forward to a full agency review and an external peer review due to differences in opinion with (b) (6) senior leadership and the staff scientists.

220 none

221

Inconsistencies between divisional and Center requirements Long lag times for management reviews Inhibition of web site updates Stalled release of peer-reviewed and 508 compliant training materials Lack of financial support for external peer review

222 No experience with scientific products.

223 clearance process fore publication of scientific information is inconsistent within (b) (6) and EPA in general. There is no one process for publication clearance. Time consuming and very inconsistent.

224 N/A

225 None

226 The clearance process was controlled by OMB.

227

(b) (5), (b) (6)

.

228 no comment

229 N/A

230 I have only witnessed the process from the outside. I'm aware of some instances where lower level staff refused to sign scientific products. But managers ultimately were pressured to sign instead.

231 In the last 4 years whenever I submitted an abstract for internal clearance, the process has taken about a month, and then we were expected to make significant changes in a very short time. This has always been a stressful process.

232 NONE

233 The clearance process and the research it covers seems to be an evolving process.

234 Staffing shortages put far too much burden on (b) (6) researchers during the clearance and tracking process. (b) (6), and double counting/renaming of products/sub products/publications contribute to unnecessary frustration by researchers. (b) (6) should consider staff hires to shift this burden from the researchers so that their time can be spent on conducting research.

235 The main problem in the last two years was the (b) (5), (b) (6). Program offices like (b) (6) and (b) (6) can take over 4-5 weeks to review a product as required by the (b) (6), (b) (5) at that time. It could be 2 months or more. No real timeline even if the Center tried to get one from the reviewers outside (b) (6). Within (b) (6), the system worked quickly.

236 I do not have any scientific products that went through the clearance process. I do have a product that is currently going through the process and have not had any problems receiving clearance in a timely manner.

237 Internal clearance in the regions is somewhat unknown and inconsistent especially how it relates to external presentations etc.

238 N/A

239

When I collaborate with regions or program offices, they do not have clearance procedures that parallel (b) (6), and as a consequence, I end up doing a lot of clearance activities on collaborative projects; even when my role may be rather minor.

240 NA

241 N/A

242 This process in non-applicable to my position at the Agency.

243

The amount of steps and review to release scientific products has increased over the years. While I agree that review is necessary, it seems that some products take 6 months to a year to get released. We have the internal peer review, technical editing, quality assurance review, first line supervisor review, external peer review, first line supervisor re-review, and finally second line supervisor review. This does timeline does not include anything that might need (b) (6), (b) (5) or an (b) (6) review. In addition, some products might need review from the program office which takes even more time.

244 Clearance procedures are still confusing and time consuming.

245 Some materials took a long time to clear and it was not obvious to me why some changes were made before they could be released.

246 Deference was given to political appointees in internal reports and manuscript revisions (see previous note about censoring of terms and concepts that the appointees considered unsuitable (e.g., (b) (5)

247 working across program offices (e.g.. (b) (6)), it would take more than a year to get comments returned without substantive feedback (not true for all but for some)

248 No comment at this time.

249 Although I personally have not had difficulty with clearing scientific products, I believe that certain areas of research are more controversial and do have difficulty clearing scientific products.

250 The clearance process is not clear or transparent; an SOP should be developed and shared w staff.

251

From what I've experienced, processes are relatively smooth. Generally holdups occur when Regions need to workout differences or comments provided by headquarters staff.

252 (b) (6) . It only cleared (b) (6) review in April 2021. Past leadership delayed and delayed, making up problems only to change their minds and reopen resolved issues.

253 No experience in 2019-20

254 I have not specifically witnessed or participated in such matters.

255 Clearance (and other administrative/QA) procedures change constantly, usually in an increasingly stringent and onerous direction. They require not only time to accomplish, but mental energy even to determine what the current requirements are, and how they apply to the task at hand. These procedures differ by Office, sometimes creating difficulties for collaborative products.

256 I have no comments.

257 The time of review can improve.

258 [redacted].

259 My only comment is that sometimes there is inconsistency in selecting what needs [redacted] versus what does not.

260 The agency is all about climate change so your views better support that position.

261 For abstracts and conference presentations during the past two years it has been a smooth and rapid process. Earlier submissions to journals that involved a longer chain of approvals were time consuming and confusing.

262 Presenting scientific data and presentations to the community was stifled by HQ need to review the information (some scientific) in the presentation. We decided not to give the presentation because it was so burdensome to get the approvals.

263 The clearance process is unknown in [redacted]

264 [redacted]

265 Not applicable

266 Internal peer review of documents differs across divisions. It is very difficult in general to balance best professional judgement in contrast to adherence to division guidance across the Office. There are benefits to relying more on BPJ, and there are benefits to relying more on guidance. It is an area that probably should be explored and discussed more so we are striking the appropriate balance.

267 Documents went up the management review chain and it took months for the documents to be approved. This also includes OMB. Every document was considered important and needed to be reviewed (historically would not have been reviewed).
268 The clearance process is unclear.
269 The policy climate is always a consideration when evaluating scientific research outcomes and how those outcomes are reported.
270 Personally, I did not have any scientific products that I contributed to in the past two years that required clearance. I worked with HQs on various documents from which they would seek clearance, if needed.
271 This does not pertain to me.
272 No comment
273 Clearance process kept changing throughout the previous administration within my branch at (b) (6) and at our HQs office. It was not always predictable.
274 It has been difficult to conduct research during this pandemic. (b) (6) [redacted]
275 na
276 N/A
277 ridiculously complex. Seems paranoid and treats scientist like children
278 I have not had any experience in the past 2 years with this
279 N/A
280 After having collected data of interest to the general public, the validation process took an unreasonably long time. Because of contract-related issues/uncertainties and a lack of career staff, it was impossible to tell the public when to expect results, leading to frustration and anger from the public.
281 delays were consistence
282 None.
283 No basis for comment.
284 The only issue I would like to see improve in the clearance process is the amount of time. Science, especially studies focusing on cutting edge and key issues, necessitate a faster review in order to remain competitive with external researchers. It would be helpful if there was an "expedite track" for internal clearance in these instances.

285

The clearance process has become cumbersome. The requirement of 2 technical reviews and policy review prior to submission to the journal in some situations takes too much time and does not add value, especially when the journal is going to do their own reviews. EPA technical reviews can range from almost a pass through to excessively nit-picky. EPA policy reviews usually can't resist getting involved in the technical review.

286

(b) (5) this this was thus both a scientific integrity issue and a resource waste.

287 Meeting abstracts, posters, and presentations are usually cleared very quickly. Sometimes papers can take a while.

288 Too many chiefs, not enough indians.

289 It's not clear when a paper will be elevated for (b) (6), (b) (5) and when it won't be. There doesn't appear to be any rhyme or reason to that and it significantly affects the timeline and makes it difficult to plan.

290 our products have experienced delays lasting months and even years due to the lack of internal review processes.

291 I will not comment for fear of reprisal.

292 Don't have any.

293

The timing to do this was all over the place and took away valuable time from our work

294 Haven't submitted items for clearance during this time.

295 For social media channels/Fact Sheets, standardization is the key. Approve once/use many phrases allow review of standard phrasing/infographics and other communications products before they are added to the (b) (6) to be used for public products with the understanding that this Content has been approved by management to represent EPA's position.

296 n/a

297 The clearance process changed based on the chemical (b) (6). For some chemicals, multiple rounds of evaluation were needed before the (b) (6) were cleared.

298 I have no experience with the formal clearance process in (b) (6) - but in (b) (6), there was one internal (b) (5), (b) (6) [redacted].

299 None

300 none

301 Draft reports were not allowed to be distributed internally for review, nor externally. There were concerns that distributing the reports would shine the Light of Mordor on us and we would be subject to Whack-A-Mole and eliminated.

302 When using existing EPA datasets, communicating with the many groups that collect/curate these datasets is important but extremely time-consuming and has set back publication by likely several months.

303 NA

304 Additional burden has been placed on researchers to make available all data associated with products via systems such as (b) (6) No researcher I know of would deny a request to access or review data associated with one of their products, but requiring the preparation, submission, and review of all data each time seems like a lot of overkill. It adds significant burden (and disincentive) to researchers in all instances when I would be quite sure only a small percentage of that data is being accessed via these systems. It seems like one of many instances of punishing the many for the transgressions, or more like in this case perceived, transgressions of a few. Interestingly enough I think the issues that lead to development of these rules stem more from concerns about lack of transparency in policy/rule making, however it appears to be (b) (6) who is bearing the brunt if not all of the result.

305 I've had minimal involvement with purely scientific products, but feel there have been regional/HQ policy decisions not based on sound science that directly affected work products (b) (6), (b) (5) [redacted]

306 (b) (6) as a whole does not have a consistent policy to implement OMB's Data Quality Act of 2002. (b) (6) has a policy in place but it is not Regionwide.

307 N/A

308 No comment.

309 No experience
310

I have to revisit the requirements every time something needs to be cleared because each type of document has different clearance requirements, e.g., number of internal reviews.
311 none
312 10 months is an unacceptable timeframe for clearance of a manuscript.
313 n/a
314 The clearance process took too long to submit by external deadlines.
315 I authored a journal article, but it was unclear the internal clearance process at the Regional level. I received clearance approval from (b) (6) and HQ first then had to circle back to the regional approvals.
316 I have no personal experience with the clearance process.
317 it was ok
318 Some products took a long time to clear within (b) (6)
319 Internal routing/editing can take a considerable amount of time as editors weigh up the chain of command.
320 It gets more and more complicated and more and more bureaucratic.
321 No basis to judge
322 There was no consistency on how products were cleared or the amount of time it took for a product to be cleared. There needs to be a new clearance procedure that everyone follows throughout the agency.
323 Better education on the process.
324

Paper entered into (b) (6) in 2020 that only recently cleared; required almost one year. This was due in large part to slow action on part of approving officials. These kind of delays are personally unacceptable and should be institutionally unacceptable.
325 The question is oddly worded as we do not conduct research in (b) (6); (b) (6) [redacted] Delays are typically due to disputes between parties which delay decisions and field activities. The stronger the support for regulatory enforcement generally the fewer challenges we face.
326 I have never been involved in that process

327 My experience is in submitting comments to another agency. The decision on whether and what was submitted was made at very high levels within the agency and was not consistent with staff recommendations.

328 (b) (5), (b) (6) [redacted]

329 (b) (6) [redacted]

330 See my comments about about the (b) (5) [redacted]

331 I think this whole survey is missing the point. Certain areas of the agency's work as it it tied to its mission have become politized. I personally did not experience a lot of interference or pressure to conduct rushed or poor science. I did not feel pressure to change the outcomes of scientific results. These statements pertain to work areas/program areas we were told/ authorized to work on. However there were large areas of work that we could not work on. So there was not interference/pressure in those work areas because there was not active work. The work was just shut down and there was no need for any level of management or staff to feel pressure. I think you should have included questions about whether you had work/program areas that were active and then shut down and work stopped or funding was eliminated. In other words, I am not sure there was a ton of bad science within the agency. I think there was just zero science being done in certain areas of work that the Agency historically worked on or perhaps should work on since it fits within the Agency's mission.

332 N/A

333 N/A

334 Report review and approval was extremely delayed / put on hold during the last election season. This delayed the release of these reports by several months (finished during summer 2020 and not released until well into 2021).

335 N/A

336 N/A

337 Not sure or have the words to give suggestions for improvement. It was a very challenge two years. Hope for a better future in EPA until retirement.

338 Getting anything which could have been mildly considered controversial approved was very challenging. Mostly stalled rather that got denied.

339

'-Overall I noted the review process takes a lot of time and sometimes it is vague as to how long it will take depending on competing priorities; and clearance also depends on priorities of agency at the time (so sometimes it is a bit discouraging to submit things)

340

The process changed suddenly without a new workflow in place, which greatly delayed the process of clearing items. Review from program offices became required for certain topics, and this review process was a complete black box. Reviews would often be minimal, with no real changes, but the process would add weeks to months to clearance.

341 Need effective procedures for internal and inter-agency review/clearance.

342 People who produce a lot with little to no comments have little to no oversight- my comments are technical and good but receive rigid scrutiny by first line management- even comments I am carrying forth from a retired predecessor who had little to no scrutiny- and each time I put forth the comment even though it was previously approved- resulted in sending the comment out to a third party ((b) (6)) to evaluate

343 Not applicable

344

There is no procedure. People draft reports based on ad-hoc information, and no data quality/integrity issues ever come up. It is a well established process to NOT question any information presented, we can literally just make things up and that is fine.

345 Individual journal articles, conference presentations or abstracts from my staff generally did not need review beyond (b) (6) and were cleared fairly expeditiously (workload notwithstanding). We had a report take 21 months to clear (b) (6), from when we first briefed the AA on the results and delivered the report in March and April 2019 to posting the report on the website Dec.31, 2020.

346 N/A

347 Many papers with EPA authors include co-authors from multiple AAships; given that the processes can differ (including being not required in the (b) (6)) this can lead to confusing end results or additional time for clearance with several approvers.

348 Oy - is this a survey or a disclosure exercise?

349 N/A

350

clear timelines/deadlines in the clearance of products that require inter-agency review

351 I have not had any scientific products that I've contributed to, but I have and still am contributing to the scientific clearance procedures in our Region

352 As far as I know, we have always had a peer review process for enforcement reports. In-house reviews just ensure that the reports accurately state what our scientific results say about the reasons for our enforcement actions.

353

Too many levels of clearance and process could take months. This included lectures for college courses, abstracts and presentations. Even already cleared slides would have to be cleared for the next presentation and would take as much time as de novo material.

354

The process is often the bottleneck that determines whether abstracts or papers are written and submitted. (b) (5) [redacted]

355 I can not recall of any at this time

356 A clearer and more transparent process of the clearance process through the highest decision-making process could definitely improve both agency scientists and the public's trust in all science-based products.

357 Products were almost always elevated to the political level which slowed down the process tremendously.

358 Our QA process is documented and followed. We also score our process for each product the QA reviews.

359 Process was designed to meet the goals of a workgroup/team.

360 Internal clearance processes often don’t enlist reviewers with sufficient expertise to pass judgment.

361

(b) (5) [redacted] EPA's website is not as good as the websites of sister agencies. i wonder if the difficulties in finding information on the EPA website reflects a lack of transparency, or a lack of funding, or both.

362

I've noticed papers getting stuck for sometimes a long time (months) under management review. I'm not sure of a solution, since everyone has too much work to do.

363 SW implementation of the internal clearance process is cumbersome

364 I think the (b) (6) clearance process for scientific products worked well prior to 2017. The (b) (6) leadership from 2017-2018 broke the standard operating procedures and chaos ensued. I'm not sure if the (b) (6) leadership from 2019-2020 managed to fully restore order, and I haven't seen enough of the process under the current (b) (6) leadership to judge the situation now.

365

the (b) (6) does not have any formal or informal procedures for internal clearance or interagency review. managers are not aware of how to process authorship. only a handful of employees within the water division are engaged in this activity.

366

Clearance should be done in parallel manner, not sequential. Too much time is wasted.

367 NA

368

Cross-agency review is not as efficient as (b) (6) review process. I have been made aware that other offices and regions do not have a specific review process that is tracked as it is in (b) (6). (b) (6) system leads to an organized and consistent process that I would suggest be adopted by other parts of EPA. Some individuals who I have collaborated with have indicated to me that they wished their offices had processes that were set. And, one individual has indicated that they often are asked to rescope work that has already been done, simply because a higher management individual preferred that they had looked at something differently or more broadly. That should not occur.

369 None

370 As (b) (6), products are often developed first without the required planning on the objectives. However it is often the case that the quality objective is dependent on the best available data and the model used is mechanistic.

371

The lines between primarily scientific and primarily policy-based work products is murky and makes it difficult to answer these questions. The one is wrapped up in the other...

372 The internal clearance process could be improved by requiring staff to take it more seriously (i.e., this is not just a box to check, instead we expect a real review) and authors to address each comment by the internal reviewer.

373 I do not yet have any personal experience with the clearance process.

374

There is no inter-agency review of (b) (6). There is only an internal review by the same staff who are too overloaded to do more than read a document for grammar, and a review by management and (b) (6). The document goes out for public comment/other agency review (both occur at the same time) and then we are not allowed to take those comments and make any changes to the document unless it would substantially change the findings in the document (which we are strongly discouraged from doing).

375 (b) (5), (b) (6)

376 n/a

377 N/A

378 NA

379 I HAVE NO EXPERIENCE WITH ANY OF THIS SUBJECT

380 Does not apply to my position

381 Not sure about (b) (6) but in my division everything is delegated down to the branch level and must be approved by a senior scientist and branch chief. No other contact from the scientist is allowed with other reviewers such as higher management, (b) (6), regulatory folks. I am not allowed to contact any of these people with concerns and impelled to sign things on deadline with their comments.

382 (b) (6) with (b) (6) staff that are still languishing. Mostly related to the review process, and aforesaid mention of (b) (6) inclusion.

383 No experience as I am a very new employee.

384 It took over a month and a half to clear a simple abstract for a poster at a scientific conference. It went through first, second, and IO as well as a senior science advisor for (b) (6). A publication could easily take half a year.

385 If anything, there is too much micromanagement and documents take longer to clear for publication than they should.

386 During 2019, (b) (6) produced a one-pager clearance approval form to help simplify the clearance process within (b) (6). While this was heralded, I'm not sure the form has been used.

387 n/a

388 I have not attempted to write any scientific product because of fear retaliation and (b) (6) has removed me from working as (b) (6) .

389 No experience 2019-2020

390 N/A

391 Reports are often held up by upper management review, delaying their release to our customers and impairing our ability to produce quality work in a timely manner.

392 Sometimes there's a general lack of transparency from various decisionmakers involved in the chain of command, etc.

393 I was not here during 2019-2020.

394 Products on high interest topics (b) (5) sometimes require (b) (5), (b) (6) to the Program office ((b) (6), for example). On occasion, manuscripts sat for many days (40+ days in one case) awaiting review by the Program office, and come back with non-policy oriented comments/edits on discussion of the data and conclusions. I think (b) (5) should be just that, with perhaps a fixed, short amount of time to review the document for policy implications.

395 Only been involved in internal review/clearance, and process worked fine with Divisional staff and DSIO.

396 Clearance is a mess. It highly differs across Centers. For example, some Centers put presentations up on (b) (6), some put them up on a Figshare site – why are we doing that differently? (b) (5), (b) (6) I feel like the additional processes to make our research available to the public causes so much admin burden for clearance. If I hear one more time, well it is just one more step – it is one more step in addition to the 5 other steps that have been added in the last few years, when they are all added up, it is a lot of time!

For clearance of a journal article, (b) (5), (b) (6)

[redacted]

There is no process at (b) (6)

398

The (b) (6) clearance process does not include program (HQ and Regions) review. There are times when a research paper has scientific integrity issues because sometimes (b) (6) doesn't know what is a policy conclusion and what is a scientific conclusion and sometimes (b) (6) misidentifies applicable statutes, regulations, and place names. I have seen papers get published by (b) (6) researchers with these problems.

399 Many products held up with the (b) (6) political appointee's review/edits/changes and requests for meetings.

400 N/A

401 Clearance is 100% based on the degree to which the product promotes current sociopolitical targets (including the past 6 months).

402 The need for mutliple levels of review, while necessary, is frustrating and can often take too long. Included in this is the re-review of edited documents.

403 too many questions and too many details

404

The flagging of products as high visibility and needing (b) (5), (b) (6) just because they deal with a particular topic creates delays. The initial supervisor to division level review is generally predictable in the amount of time required but then once it is sent to another EPA Office the timetable becomes extremely unpredictable and PIs are generally left out of the loop as that process is coordinated by other individuals.

405 Documents - even non controversial - would sit waiting for review without any indication of when they would proceed or why they were being delayed.

406 Post (b) (6), our new Center has staff from four different prior organizations with very different ways for clearing and making science public. Some strong personalities are unwilling to compromise on a new approach to clearance and it is causing great confusion and delays . a forthcoming standard SOP should help

407 The (b) (6) is helpful for management and for reporting and for consolidating the planning with the reporting side. It needs to be recognized that this additional functionality is a burden on scientists, and comes at the cost of additional administrative hurdles and time for researchers to get their manuscripts submitted, approved and out the door. This creates many additional steps for reviews that are less about clearance, and more about accounting for product delivery for the (b) (6). In order to clear a document, researchers now need to create (b) (6) Looking at only the time in (b) (6) can underestimate the timeline from having a manuscript ready to being able to submit to the journal. As EPA researchers, we will go through all of these steps. Where it becomes more difficult is in managing external collaborations and participating on papers with outside colleagues. We often don't want to "drag them through our clearance process" and subject them to multiple rounds of comments, edits and reviews from a process that is completely unknown to them. An article with a collaborator could require up to 4-5 rounds of EPA reviews - 2 tech reviews, 1st line supervisor, 2nd line supervisor, QA, etc...

408 N/A

409 No personal experience

410 THEY CHANGE THE RULES ALL THE TIME! PLEASE STOP DOING THIS OH MY GOSH!

411 Unreasonable deadlines were imposed on (b) (6).

412 I have not been involved with the development of scientific products during the past two years.

413 No personal experience.

414 ew Employee, not enough experience with EPA to comment.

415 n/a

416 Journal articles have been easy to work on over the last two years.

417 Some types of products have a clear review process. But high profile work is not clear when approval involves all parts of EPA. (b) (5), (b) (6)

418 I have no idea what the clearance process is - I mean I know it exists, but the process is a mystery to me.
419 I haven't authored any scientific products. I feel that there could be more education on more mundane products such as EPA websites and how content is cleared.
420 N/A
421 I don't understand why data are cleared twice for a single publication -- once when the manuscript is submitted to a journal and again when the manuscript is published. It is two levels of review both times--1st and 2nd line supervisors. Maybe the data for a publication sometimes changes between journal submission and publication? Why does it take two levels of supervisors either time? Do we not trust 1st line supervisors to take their responsibilities seriously?
422 Scientific documents have taken years to get approved due to managers not prioritizing their review of those documents.
423 N/A
424 No comment.
425 Clearance procedure should be consistent across (b) (6)
426 NA
427 na
428

It seems like scientific investigations are done, but not written up and QA'd in a timely manner. That makes many investigations useless for real time regulatory decision making.
429 n/a
430 n/a
431 The Trump Administration managed the Science Advisory Board behind the scenes to prevent criticism of its rollbacks of environmental protection.
432 As long as the publication supports the current policy, you are good to go. Otherwise no chance.
433 It's highly variable. I've waited over a year for review of a couple monitoring reports, whereas I've waited a month for another.
434 collaborating with all Regions and HQs

435

Clearance of scientific applications, models and tools take longer in the last 2 years because of the (b) (6) etc) that take away from other priorities. New (b) (6) changes for security, technology costs, peer review all add to delays in clearance in addition to vague requirements over how many levels (inside of (b) (6) and across EPA) are required for some products.

436 Upper management was way more interested in meeting a deadline than doing things correctly. Made for a lot of 'interesting' decisions.

437 Coordination with the (b) (6) is generally consistent.

438 None

439 N/A, but about to find out.

440 I've only needed to get abstracts and posters cleared for scientific conferences and that process went smoothly.

441 (b) (5), (b) (6)

442

The overall and general clearance process in (b) (6) was destroyed by (b) (6) unless it was established in public facing documents, such that new leadership felt they needed to create a new process for each science document or related program. The result is confusion about process steps and pathway for obtaining clearance, which leads to more confusion for all parties in terms of roles and responsibilities. This has been further amplified by reorganization, influx of more new people, and mass departures.

443 The process proceeds with high integrity. Things can move slowly however, not because of a lack of integrity, but because of the nature of government work.

444 It is difficult to predict the amount of time required to release results from research as it depends on the quality of the research and the manuscript.

445 No comment

446 (b) (5), (b) (6), (b) (7)(A)

447 The process is clear within (b) (6), but when program offices were given opportunity to review products as part of clearance substantial uncertainties in terms of time to clearance were introduced. This was particularly problematic with anything going through the (b) (6) during the period 2019-2020.

448 The records management piece of releasing reports is good. The internal legal review to ensure documents can be released is a bottleneck.

449 N/A

450 See previous comments.

451

Not all opinions in science are created equally. Having non-experts or even non-members of a scientific field comment on manuscripts for publication is fine, but the authors of the paper should not feel pressured to incorporate or respond to these comments/opinions unless a major concern is raised that could affect US EPA policy. Scientific fields are full of niches, and it takes years/decades to become an expert. It is frustrating that some reviewers in this process, who are not experts, strongly express opinions on a topic and request edits where they have little knowledge let alone expertise.

452 Really confused with the process.

453 no experience. I work with budget and financial management

454 There needs to be routine training on what needs to go through clearance process

455 NA

456 No basis to judge.

457

(b) (5), (b) (6) delayed several publications due to Program Office review taking much longer than anticipated. Database infrastructure - (b) (5), (b) (6)

458 Limit the review of materials to no higher than division management. Hold division management accountable when poorly reviewed documentation goes forward to publication. Requiring all documents go all the way up to AAship level review is preposterous and does nothing more than slow down the work of the agency, which many considered the primary objective during this two year period.

459 N/A

460 There seemed to be no rhyme or reason to the approval process. It was almost like not approving things was part of the political strategy.

461 I do not believe there is a clearance process. Data analysis is only used for internal process evaluation with nonpublic data. Analyses are not formally reviewed, but presented to decision makers.

462 there is no known timeline for reporting data to the public/media .... this is always a management decision and I as a non-manager have very little to no control over this.

463 The past 4 years are atypical in my EPA experience. It was difficult to predict the content retention and timeliness for scientific products that had any political sensitivity or impacts over the past 2 years. Political appointees should have greater public scrutiny attached to their policy and case-specific decisions.

464 Suggestion - Do not include political appointees in the review chain for scientific information release.

465 Some products (b) (5) were held by the program office longer than expected, and for unclear reasons

466 Level of management review for abstracts/posters/presentations has greatly increased, impacting review timelines.

467 It has improved as now there are multiple processes to ensure data is reviewed but inter-agency review can be very difficult because not given enough time, not enough senior scientists available for review and the review process is not always clear

468 clearing documents takes an extremely long amount of time

469 N/A. I onboarded (b) (6)

470

It has been exceedingly difficult to get things cleared through communications, even if they are not at all controversial, because the communications staff is overwhelmed with work from the (b) (6) and does not prioritize the needs of scientists. But also if EPA wants to do more EJ work we need we need people who are trained in community engaged and stakeholder engaged research, and transdisciplinary research broadly - people who think about the implications and ethics of research and how it is conducted and used, which is different from public affairs type of communications work.

471 N/A

472

On average, clearance takes 3-6 months in [redacted] while in other branches it takes no more than 2 weeks. It makes it very stressful to have outside colloborations and make deadlines when your work is in [redacted] purgatory for such a long period of time with no action.

473 No basis of judgment

474 Many approvals are necessary and I've consistently had to email/call folks to keep the process moving.

475 We have chosen to utilize [redacted] procedures, where applicable, due to the clearer nature of review in that office.

476 n/a

477 NA

478 Intimidation to change conclusions

479 N/A

480

The clearance process is still a work in progress with desired changes awaiting attention.

481 list the approximate timeline for review/clearance processes

482 N/A

483

The clearance process has become more onerous with each passing year. It is difficult to implement and takes way too long to complete. Then when individual Centers add on their additional review and clearance procedures, it becomes even longer. Most of these procedures have been developed by people that don't conduct science or clear products themselves. So it seems that they have no regard to the over burden the policies they develop have on the researchers and the process time line. Very frustrating process.

484 internal clearance often faces significant delays if supervisors or colleagues are busy or lack technical understanding of content. external peer review often takes significantly longer to set-up and conduct than expected

485 No problems

486

The improvement has come with a new administration not interested in delaying bad news.

487

The clearance process often leads to incredibly long timelines while waiting for various management staff to weigh in with opinions that are rarely, if ever pertinent to the scientific methods or conclusions. More than that, the bureaucratic requirements for the clearance process are incredibly onerous and require mountains of paperwork that are often impossible to complete without doubling the lifetime of the project. There is simply no way to provide timely results and adhere to the current EPA clearance process.

488 N/A

489 No experience.

490

There is no defined process in [redacted] for the clearances needed to publish papers or who needs to review it. Potential programs affected are allowed to review, and that can change with every paper and programmatic perspective is not relevant to scientific integrity.

491 Clearance of scientific products through EPA HQ was slow at best.

492 I have sent a few products up the chain for clearance that were not cleared for release for which I was either never given a reason, or given a reason that was vague or ambiguous, or did not make any sense at all.

493 No experiences.

494 The clearance process could be staff driven at the beginning but then became a process limited to the politicals. Some politicals used their staff to review but others didn't, including [redacted].

495 Clearance time from 1st and 2nd line supervisors can be difficult to predict

496 It is too protracted. I understand and support the need for a clearance process, but requiring multiple layers of management to clear a product leads to delays and having to withdrawal from presentations at scientific meetings and publications.

497 [redacted]. In the end the problem was resolved by not sending things to program offices for [redacted]. Going forward, [redacted] should send items 'for awareness' as a courtesy when articles are submitted to the journal, and make it clear that any resulting program office comments will be considered along with journal editor comments, but there will be no 'response to comments'.

498 Prior to the last administration, clearance of publications, presentations, abstracts, etc. was done at the Office Director level. The process during the last administration including 2019-2020, all clearances had to occur at the (b) (6) AA level, which added more time for clearance, and created an atmosphere of mistrust since the politicals did not trust the OD to clear materials for their own division.

499 Clearance process works well.

500

it is hard to predict when things will be completed because (b) (5), (b) (6) [redacted]

501 The clearance process is "hit or miss" in (b) (6). I think there are probably many reasons for this, but the political influence runs deep in this office.

502 I was just told verbally that there are now new people/organizations within EPA that need to review and comment on items before they could be released. Put the process in writing and allow review and comment before it's finalized.

503 In (b) (6) CBI is the main issue with releasing materials to the public. FIFRA laws drives what can be disclosed. The FOIA backlog can be deceiving, since a percentage of FOIA requests are really seeking CBI information.

504 I was criticized for following a process I had followed in the past for the exact same type of review that I had done in the past. I was trying my hardest to make sure the review of this work followed an accepted practice.

505

I have experienced very different standards and procedures to clear many of my scientific products over the last 2 years. I have had many products that were subjected to much higher levels of review, scrutiny, and longer periods held for review than many of my peers in Division. (b) (5) [redacted]

506 Responding with factual statements and data supporting observations made at our last OIG Audit

507 For FOIA work, there were checkpoints for clearance of information that was released to the pubic.

508 Political appointees were very hands-on with reviewing presentations and providing very specific instructions for what could and couldn't be presented to external audiences that was solely based on political issues.

509 need to be more efficient. Do not treat this as a journal peer-review.

510 The (b) (6) clearance process has been neither transparent nor consistent which is why we started an ELMS project in (b) (6) to try to create transparent and consistent guidance for clearance of technical products. Under the previous administration, everything had to be sent to the AA (b) (6) which caused needless delays due to political interference of what appeared to "scientific games." We had 2 abstracts delayed by one political official and it wasn't until 5:30 pm on the day the abstracts were due that she finally gave approval to our Office Director.

511 Most documents were not approved for release or it took a long time.

512 Scientists I work with published alot prior to 2016 (and I was part of clearance). I was not asked to work on clearance within the past two calendar years

513

The clearance process can be discouraging slow for documents in some research area.

514 we don't really prepare scientific products, most of my answers relate to (b) (6) reports which contain scientific data at times but I would not categorize the reports necessarily as scientific products.

515 Clearance process went smoothly, though there were various holdups depending on who was reviewing the document for publication.

516 It hasn't been too troublesome, though there have been constant changes to the various reporting mechanisms during my short time here. The patience and diligence of the staff who manage these reporting/filing systems has been invaluable, otherwise the system would by labyrinthine.

517 When required to work on policy related guidance and publications (that is based in science) that affects all regions, I was not given clear instructions on how to proceed with the clearance process, especially with cross-agency review. There needs to be better support for newer employees.

518 On timely basis.

519 n/a

520 None.

521 The clearance process is unclear and seems never ending when a document crosses multiple AA ships and even multiple offices within an AA ship.
522 See previous comments
523 NA
524

I believe that EPA staff and management became overly sensitive to use of certain words that might be controversial or contrary to administration positions. These words were requested to be removed to avoid unnecessary controversy. Although this didn't always make the documents "wrong" the changes were not scientifically based.
525 Not applicable to my duties.
526 none
527 Focus is on briefing papers. Subject Matter Experts are not included in the briefing process to managers who will ultimately make decisions.
528 We need to standardize the QA review requirements for each type of product. There is confusion among QA professionals, records professionals and PIs as to what products require a QA review prior to clearance approval. The QA review requirements are more than likely not the same across [redacted].
529 what clearance process?
530 We need more people and resources to further advance best available science and technology. [redacted]
531

Clearance through the program offices takes an unpredictable and sometimes excessive amount of time. The length of time increases significantly for politically sensitive topics.
532

The review process at [redacted] is not appropriate for the [redacted].
533 None.

534

My experience is related to products that I reviewed or that I was involved in as a liaison for [redacted] to our work in the [redacted]. As I mentioned previously, [redacted] scientists had to negotiate with [redacted] which papers they could publish because the [redacted] [redacted]. I would hope that [redacted] would move back to allowing staff to review papers that they are SME on instead of relying on the review of only political appointees with a biased viewpoint.

535

Significant delays due to issues at senior management levels. Delays have led to suggestions and reworking over text deemed incongruent with policy expectations of senior leadership.

536 My personal experiences were unbelievable. [redacted] It was astounding. But all these people are no longer with the Agency. I have full confidence that our new leadership will follow science, review data and make good decisions. Any process will be better.

537 Internal [redacted] clearance procedures are vague and requirements vary by management levels and management availability. Separate PDF and Word forms for each level of management review are cumbersome. Recommend a more streamlined, online process that allows tracking and reminders, similar to [redacted] system.

538 None

539 I have not submitted any scientific products through the clearance process. [redacted] scientists I have talked to state that time until clearance can be variable.

540 N/A

541 I have been a part of workgroups that seem to take longer than usual to get approval from political appointees.

542 None

543 [redacted] is currently working on a unified scientific product clearance process.

544 NONE

545 NA.

546

Generally the clearance process is painless and not overly intrusive. (b) (5) [redacted] his is also not truly overly burdensome, though.

547

I think publishing as a federal scientist is much harder to do than publishing as an academic scientist. I also suspect there is an imbalance in the number of peer-reviewed journal articles versus EPA documents that our typical federal scientist does too. What is the "right" balance of publication types expected in a federal scientist's research portfolio? How we collectively or variably manage/operationalize peer-review policies likely affect the number, types and quality of publications that our scientists produce.

548 The review process for scientific presentations, abstracts and manuscripts is excessive. This results in delays of disseminating information, hurts professional development, and damages morale.

549 (b) (6) has been well below staff for multiple years. The timing of projects from (b) (6) of gotten better even with lower staffing, but can get better with more FTEs.

550

Anything involving (b) (5) research is given extra scrutiny by managers usually only vaguely familiar with any of the research (and none of the program history that goes back decades) and (b) (6) willingly passed manuscripts and reports to (b) (6) for a "heads-up" and review. While we did not receive (b) (6) comments, they would sit on papers for months, and if they did comment, they had nothing technical to say (because they couldn't). Other programs and research do not have this level of scrutiny or politicization. WE have done this work for decades before and never had such micromanagement.

551 No experiences

552 N/A.

553 I have nothing specific to share.

554 N/A

555

Again, my scientific productions are (b) (6) [redacted] This is tracked. There may be some exceptions for very complex ones but most out the door within the timeframe. Concurrence process is simple - (b) (6) and first-line.

556 The path of clearance for controversial topics is not necessarily clearly defined, perhaps because there are so many facets and nuances.

557

The clearance issues experienced were for (1) agenda for advisory meeting (2) report summarizing agency decisions for advisory committee (3) posting federal register notices announcing meetings (4) presentations from agency representative (5) posting letters from the advisory committee - (b) (5), (b) (6) [redacted] That she remains in an influential position under this new administration is giving staff the impression that nothing has changed. The trust cannot be rebuilt when the same people remain in such roles.

558

Standard protocols are in place to ensure internal clearance is meet in a timely manner

559 The only experience I have is with the development of technical documents not peer-reviewed publications, policy or guidelines.

560 NA

561 Before training classes were offered, the clearance process was neither easy nor intuitive. I am other colleagues has a great deal of frustration trying to get outputs into the system. The system is easier for me to work with now.

562

(b) (5), (b) (6) [redacted] The viewpoints of career staff were not valued.

563 Varies widely based on management and topic.

564 Why did you ask administrative staff to participate in this survey?

565 I have been a peer reviewer as part of the internal clearance process for (b) (6) research papers. Often the timeline for these reviews is very tight (two weeks or less) and can be challenging to meet the deadline and provide a thorough review.

566 The internal clearance process was not always straight forward and sometimes can to be delayed for political reasons.

567

Some of these questions depend on the nature of the product, review necessary and those available to conduct, other ongoing & competing work, etc. So, despite being grounded in an overall, consistent and timely process, it can depend a bit on circumstances so some flexibility is warranted, but not beyond what would be reasonable.

568

There have been some improvements in external review of EPA products in HQ-- contractors who select the reviewers often put forward people with conflicts of interest or unqualified in a needed scientific field. HQ is allowing the workgroup members to offer comments on the reviewers and if we can only afford a few reviewers we prefer people who are highly qualified and without obvious conflicts. If we wanted to get a wide range of conflicting opinions regarding implementation we would include people with a conflict of interest. Everybody knows everybody in a limited specialty.

569 We need more "in-house" experts to improve efficiency

570 n/a

571 (b) (5) [redacted] was multimedia and included outside stakeholder involvement

572 N/A

573 The clearance process for products was unnecessarily long and seemingly held up for political reasons.

574

I participated in a rigorous clearance process for release of a scientific product to the public in 2020. The process include HQ, State and local government partner review. It certainly was impartial and inviting additional viewpoints, which in all cases were addressed.